

EXHIBIT 58

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No.  
17-md-2804

Judge Dan Aaron  
Polster

This document relates to:  
The County of Summit, Ohio, et al. v. Purdue  
Pharma L.P., et al.

Case No. 18-OP-45090 (N.D. Ohio)

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Videotaped Deposition of

JEFFREY STURMI

November 15, 2018
9:09 a.m.

Taken at:

Hilton Garden Inn
1307 East Market Street
Akron, Ohio

Stephen J. DeBacco, RPR

<p style="text-align: right;">Page 130</p> <p>1 to the number of clients that are screened for 2 the program, the number of clients that 3 declined the program, number of clients that 4 were found ineligible for the program, 5 certainly clients that are admitted to the 6 program, and then general tracking data as far 7 as retention success rates, graduation, you 8 know, rates, that type of data. 9 Q. Do you have access to that data 10 maintained by Oriana House for the recovery 11 court? 12 MS. LEYIMU: Object to the form of 13 the question. 14 A. I have access to it, so if I have 15 specific data questions, then, yes, I would 16 contact the Oriana House to make whatever 17 request, you know, was necessary. 18 Q. Do you know in what format they 19 maintain the recovery court data? 20 MS. LEYIMU: Object to the form. 21 A. I have no knowledge of what their 22 database is or their capabilities. 23 Q. Does Oriana House have any 24 requirements for providing reports to the 25 recovery court?</p>	<p style="text-align: right;">Page 132</p> <p>1 substance abuse and a mental health disorder. 2 Q. Do you know what proportion of the 3 current recovery court population would qualify 4 as dually diagnosed? 5 MS. LEYIMU: Object to the form. 6 A. I would say a lot. 7 Q. Could you give us a percentage? 8 MS. LEYIMU: Object to the form. 9 A. It would be difficult for -- for me 10 to -- to give a percentage, but I would say 11 it's the majority. It's a lot. 12 Q. Where would that dual diagnosis be 13 reported? 14 MS. LEYIMU: Object to the form. 15 A. Primarily the initial assessment, 16 which not only provides a diagnosis of a 17 person's substance abuse, but it would also 18 provide a diagnosis for mental health disorder. 19 Q. Does the recovery court provide 20 referrals for mental health services in 21 addition to addiction treatment services? 22 A. We -- 23 MS. LEYIMU: Object to the form. 24 You can answer. 25 A. We do.</p>
<p style="text-align: right;">Page 131</p> <p>1 MS. LEYIMU: Object to the form. 2 A. I'm not aware of specific 3 requirements other than, you know, if the judge 4 or myself, you know, requests data, that it's 5 provided in a timely manner. 6 Q. To whom do you make data requests 7 at Oriana House? 8 A. Typically to Emily Beers, who is 9 the Oriana House program manager for drug 10 court. 11 Q. Now, Mr. Sturmi, if I could ask you 12 to turn to the next page, which ends in 3387. 13 A. Okay. 14 Q. About halfway through the last 15 paragraph it says, "Many of our clients are 16 dually diagnosed and so we welcome the 17 opportunity to partner with our Summit County 18 mental health treatment providers." 19 Have I read that correctly? 20 A. Yes. 21 Q. How do you understand the reference 22 to dually diagnosed? 23 MS. LEYIMU: Object to the form. 24 A. My understanding of that term would 25 be someone that is diagnosed with both a</p>	<p style="text-align: right;">Page 133</p> <p>1 Q. Who are the providers with whom you 2 partner for mental health services? 3 A. It's expanded, you know, over the 4 years. Primarily in Summit County, it's two 5 agencies. Community Support Services, they 6 primarily work with clients that have a severe 7 or serious mental health disorder. The second 8 agency that we work with quite a bit is called 9 Portage Path Behavioral Health, but there have 10 been some additional vendors that have started 11 to be added to the Akron area. 12 Q. In connection with your work for 13 the recovery court, have you kept any data 14 which tracks the number of clients who are 15 dually diagnosed with addiction and mental 16 health illness? 17 MS. LEYIMU: Object to the form of 18 the question. 19 A. Not to my knowledge, no. 20 Q. Do you know where we could look if 21 we wanted to find that information? 22 MS. LEYIMU: Object to the form. 23 A. I'm not aware, you know, of -- of 24 where that particular, you know, data could be 25 obtained, other than, you know, the Oriana</p>

<p style="text-align: right;">Page 134</p> <p>1 House, you know, Incorporated. Again, if the 2 client is diagnosed with a mental health 3 disorder, that would be recorded on their 4 substance abuse assessment. 5 Q. Are you aware of any literature 6 which links substance abuse with mental 7 illness? 8 MS. LEYIMU: Object to the form of 9 the question. 10 A. I'm not sure what you mean by that. 11 Q. Are you aware of any literature 12 which finds a cause between mental health 13 illnesses and addiction? 14 MS. LEYIMU: Object to the form of 15 the question. 16 A. I'm not aware of any specific 17 documentation. I think that there's general 18 consensus that often those run hand in hand. 19 Q. And when you reference general 20 consensus, whose consensus are you referencing? 21 MS. LEYIMU: Object to the form. 22 A. Oh, the various training workshops, 23 you know, that I've attended, you know, have 24 spoken to that. Just by my experience by 25 interviewing the number of clients that I've</p>	<p style="text-align: right;">Page 136</p> <p>1 consistently, constantly asking questions with 2 our clients to determine their needs, because 3 their needs change. Their needs change from 4 the date of the assessment to the next month 5 and the month thereafter. 6 So that is where, you know, I base 7 that response on. 8 Q. Over what period of time have you 9 observed an increase in the needs of the 10 recovery court population? 11 A. Well, I don't think, you know, 12 from -- from my perspective, my opinion is 13 they've significantly increased since we've had 14 to deal with the opiate epidemic that is 15 present here in Summit County. 16 Q. What do you mean by "opiate 17 epidemic" in that last response? 18 A. As our -- as numbers -- well, just 19 in reference to when the Summit County ADM 20 Board and our treatment providers started to 21 see a significant increase in the amount of 22 clients that we serve with an opiate use 23 disorder, as that related to increase in 24 arrests, as that related to, sadly, a huge 25 increase in overdose and deaths in Summit</p>
<p style="text-align: right;">Page 135</p> <p>1 interviewed, seeing the increase in high-risk, 2 high-need offenders whom we are targeting, you 3 know, in recovery court. The clients that 4 we're serving today are much more in need of 5 services than they were 10 years ago. 6 Q. To what do you account that 7 increase in the need for services in the 8 recovery court client population? 9 A. At the present time? 10 Q. Well, do you track the reason for 11 increases in client needs? 12 A. Not -- 13 MS. LEYIMU: Object to the form of 14 the question. 15 A. Not in a -- in a data-related 16 manner, but certainly in the multitude of 17 interviews that me and our staff conducts, you 18 know, that's certainly always a part of those 19 questions. 20 Q. So you're talking about an 21 impressionistic view of the increase in needs; 22 is that right? 23 MS. LEYIMU: Object to the form. 24 A. What I would say is myself and 25 members of our recovery court team are</p>	<p style="text-align: right;">Page 137</p> <p>1 County, that -- that information, obviously, 2 was available, and once it started to become an 3 issue, then our county, you know, helped, you 4 know, to -- to identify that. 5 Q. Was there ever a time that opiate 6 use, to use your term, was not a problem in 7 Akron? 8 MS. LEYIMU: Object to the form. 9 A. I'm sure there's always been some 10 level of an opiate, you know, use issue in 11 Summit County. However, that dramatically 12 changed here in Summit County, you know, 13 roughly six years ago, in that ballpark, we 14 started to see those increases. 15 In particular, you know, the Summit 16 County ADM Board formed an Opiate Task Force. 17 I believe that started in 2014. So that was a 18 pretty clear sign, you know, when the agency 19 that is charged with that task to help all of 20 our treatment providers, when they formed the 21 Summit County Opiate Task Force, that was a 22 clue, you know, that we had a major issue going 23 on. 24 Q. What is the dramatic change that 25 happened around 2012 that you referenced in</p>

<p style="text-align: right;">Page 138</p> <p>1 your last answer?</p> <p>2 MS. LEYIMU: Object to the form of</p> <p>3 the question.</p> <p>4 A. I would say when courts, treatment</p> <p>5 agencies started to identify more and more</p> <p>6 clients that were coming to their attention for</p> <p>7 having an opiate use disorder, that was</p> <p>8 exacerbated by overdose, whether that client</p> <p>9 lived or died, you know. So data has always</p> <p>10 been received by the -- by the coroner's</p> <p>11 office, but that information started that</p> <p>12 process.</p> <p>13 Q. What data are you referring to</p> <p>14 which reflects an increase in the number of</p> <p>15 individuals with an opiate use disorder?</p> <p>16 MS. LEYIMU: Object to the form.</p> <p>17 A. The data that -- that I would --</p> <p>18 would come back to is, again, the countless</p> <p>19 interviews that I've conducted or our recovery</p> <p>20 court staff have conducted with clients that</p> <p>21 are reporting opiate use disorders.</p> <p>22 Combine that with arrest rates,</p> <p>23 charges, and in particular, overdose data,</p> <p>24 that's what led, I would think, the Summit</p> <p>25 County ADM Board, you know, to sound the alarm.</p>	<p style="text-align: right;">Page 140</p> <p>1 MS. LEYIMU: Object to the form.</p> <p>2 A. I would think the Akron Police</p> <p>3 Department or the Akron Municipal Court's</p> <p>4 Information System. We term that as AMCIS.</p> <p>5 Q. Do you personally have access to</p> <p>6 AMCIS?</p> <p>7 A. Yes.</p> <p>8 Q. To your knowledge, does AMCIS</p> <p>9 categorize law enforcement encounters by the</p> <p>10 type of drug involved?</p> <p>11 A. No, not to my knowledge. It's a --</p> <p>12 it's an older, somewhat antiquated database.</p> <p>13 Q. So if we wanted to verify the</p> <p>14 number of arrests that involved an opioid</p> <p>15 substance, how would we do that?</p> <p>16 MS. LEYIMU: Object to the form of</p> <p>17 the question.</p> <p>18 A. That would be a question you'd have</p> <p>19 to ask an IT person.</p> <p>20 Q. Do you know of any system to which</p> <p>21 you have access, which tracks law enforcement</p> <p>22 encounters based on the drug involved?</p> <p>23 MS. LEYIMU: Object to the form.</p> <p>24 You can answer.</p> <p>25 A. I don't have knowledge of that, no.</p>
<p style="text-align: right;">Page 139</p> <p>1 Q. When you said the Summit County ADM</p> <p>2 Board sounded the alarm, what specific actions</p> <p>3 are you referencing?</p> <p>4 A. The -- the start of -- of the</p> <p>5 Summit County Opiate Task Force.</p> <p>6 Q. Other than the start of the Summit</p> <p>7 County Opiate Task Force, what facts do you</p> <p>8 reference in connection with your statement</p> <p>9 that the opiate epidemic started in 2012?</p> <p>10 MS. LEYIMU: Object to the form.</p> <p>11 A. Again, I would just come back to</p> <p>12 what I've already indicated. You know, we saw</p> <p>13 a marked increase in arrests. We saw a marked</p> <p>14 increase in clients that were reporting opiate</p> <p>15 use disorders. And that information, you know,</p> <p>16 was supported by data that we received from</p> <p>17 Summit County ADM Board as it related to</p> <p>18 overdoses.</p> <p>19 Q. Mr. Sturm, you mentioned a marked</p> <p>20 increase in arrests. Do you mean arrests</p> <p>21 related to opioid substances?</p> <p>22 A. Certainly in some occasions, yes.</p> <p>23 Q. Where would we look at data which</p> <p>24 tracks an increase in arrests related to opioid</p> <p>25 encounters?</p>	<p style="text-align: right;">Page 141</p> <p>1 Q. You also mentioned reported opioid</p> <p>2 use disorders by clients. Can you identify any</p> <p>3 aggregate data source which reflects the number</p> <p>4 of reported opioid -- op- -- excuse me, opioid</p> <p>5 use disorders by recovery court clients?</p> <p>6 MS. LEYIMU: Object to the form of</p> <p>7 the question.</p> <p>8 A. Not a specific database, no.</p> <p>9 Q. Is there anywhere that we could</p> <p>10 look in order to identify the number of</p> <p>11 recovery court reported -- recovery court</p> <p>12 client opioid use disorders?</p> <p>13 MS. LEYIMU: Object to the form.</p> <p>14 A. I can't speak to whether the Oriana</p> <p>15 House does or does not track that information.</p> <p>16 Q. Does the recovery court track that</p> <p>17 information?</p> <p>18 A. Not specifically, no.</p> <p>19 Q. Does it generally?</p> <p>20 MS. LEYIMU: Object to the form.</p> <p>21 A. Not at the present time.</p> <p>22 Q. The last data source that you</p> <p>23 referenced was ADM overdose death reports; is</p> <p>24 that right?</p> <p>25 A. That's correct.</p>

<p style="text-align: right;">Page 142</p> <p>1 Q. How is that information reported?</p> <p>2 A. The Summit County Public Health</p> <p>3 district collects that data in -- in</p> <p>4 communication with the Summit County medical</p> <p>5 examiner's office.</p> <p>6 Q. Does the overdose data maintained</p> <p>7 by ADM identify the drugs involved in the</p> <p>8 overdose?</p> <p>9 MS. LEYIMU: Object to the form.</p> <p>10 A. I can't speak to that. You'd have</p> <p>11 to, you know, inquire with, you know, the</p> <p>12 agencies that oversee that data.</p> <p>13 Q. Are there any other sources of data</p> <p>14 which lead you to formulate your opinion that</p> <p>15 the opioid -- opiate epidemic began in 2012?</p> <p>16 MS. LEYIMU: Object to the form.</p> <p>17 A. I use that as a benchmark. It's</p> <p>18 very difficult to look at a calendar and</p> <p>19 pinpoint a specific day, you know, that, you</p> <p>20 know, this particular issue, you know, started</p> <p>21 in our community.</p> <p>22 But as -- as I look at, you know,</p> <p>23 the calendar and looking at those other factors</p> <p>24 in speaking with the various colleagues that I</p> <p>25 work with, and the fact that the Summit County</p>	<p style="text-align: right;">Page 144</p> <p>1 work -- well, I started in '96, you know, so</p> <p>2 you're saying late 1990s?</p> <p>3 Q. Correct.</p> <p>4 A. Okay. I wasn't aware, in the first</p> <p>5 two or three years of my career with the City</p> <p>6 of Akron, that it was a specific, you know,</p> <p>7 problem that it is -- or what I perceive it to</p> <p>8 be -- today or in the recent past years.</p> <p>9 Q. But as a probation officer in the</p> <p>10 late 1990s in Summit County, you had encounters</p> <p>11 with clients who used opioids, correct?</p> <p>12 MS. LEYIMU: Object to the form.</p> <p>13 A. I had clients that -- that used any</p> <p>14 number, you know, of substances, and opiates,</p> <p>15 you know, certainly was one of them.</p> <p>16 Q. In the -- the data sources that you</p> <p>17 referenced, do you know if there's any</p> <p>18 reporting or distinction drawn between</p> <p>19 prescription opioids and non-prescription</p> <p>20 opioids?</p> <p>21 MS. LEYIMU: Object to the form.</p> <p>22 A. I'm not aware of any specific tool</p> <p>23 that identifies that.</p> <p>24 Q. Is that -- is that distinction</p> <p>25 between prescription opioids and</p>
<p style="text-align: right;">Page 143</p> <p>1 ADM Board started an Opiate Task Force in 2014,</p> <p>2 you know, that's where I base that information</p> <p>3 from.</p> <p>4 Q. Earlier today you testified that</p> <p>5 when you worked as a juvenile probation</p> <p>6 officer, you had clients that abused opioids;</p> <p>7 is that correct?</p> <p>8 MS. LEYIMU: Object to the form of</p> <p>9 the question.</p> <p>10 A. That's my recollection, yes.</p> <p>11 Q. Do you believe that there was a</p> <p>12 problem with opioid abuse in Akron in the late</p> <p>13 1990s?</p> <p>14 MS. LEYIMU: Object to the form of</p> <p>15 the question.</p> <p>16 A. I can't speak to that because I</p> <p>17 didn't work for the City of Akron at that time.</p> <p>18 Q. I -- I apologize. Let me rephrase</p> <p>19 that question.</p> <p>20 Do you believe that there was a</p> <p>21 problem with opioid abuse in Summit County in</p> <p>22 the late 1990s?</p> <p>23 MS. LEYIMU: Object to the form of</p> <p>24 the question.</p> <p>25 A. Again, I -- I didn't -- I didn't</p>	<p style="text-align: right;">Page 145</p> <p>1 non-prescription opioids important to your work</p> <p>2 with the recovery court?</p> <p>3 MS. LEYIMU: Object to the form.</p> <p>4 A. I think that any information that</p> <p>5 we glean from our clients is -- is helpful</p> <p>6 as -- as we determine the best way to provide</p> <p>7 services to them.</p> <p>8 So knowing whether they started,</p> <p>9 you know, with prescription medication or</p> <p>10 medications that they purchased on the street</p> <p>11 is -- is helpful, you know, to our team.</p> <p>12 Q. Do you have any system for tracking</p> <p>13 the number of clients that were introduced to</p> <p>14 prescription opioids with a valid prescription?</p> <p>15 MS. LEYIMU: Object to the form.</p> <p>16 A. Not a specific, you know,</p> <p>17 instrument that we use or a data collection</p> <p>18 tool, no.</p> <p>19 Q. Is there a gener- -- general data</p> <p>20 collection tool you use?</p> <p>21 A. Not that I'm aware of, no.</p> <p>22 MS. WU: All right. So I'd like to</p> <p>23 mark -- have the court reporter mark as</p> <p>24 Exhibit 6, AKRON 001109379.</p> <p>25 - - - - -</p>